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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

SAM BHATIA,

DEBTOR.

Chapter 13
Case No. 16-31404-KCF

**CERTIFICATION OF COUNSEL IN OPPOSITION TO CREDITOR'S
APPLICATION FOR EARLY TERMINATION OF LOSS MITIGATION**

I, Christopher J. Balala, hereby certify as follows:

1. I represent Sam Bhatia ("The Debtor") in the above captioned Chapter 13 case, and as such, I have personal knowledge of the facts recited herein.
2. I submit this certification in opposition to Wells Fargo Bank, N.A. ("Wells Fargo") Application for Early Termination of Loss Mitigation.
3. On November 8, 2016 the Debtor filed a voluntary petition for relief pursuant to Chapter 13, Title 11 of the United States Bankruptcy Code.
4. On December 28, 2016 this Court entered the Loss Mitigation Order allowing loan modification negotiations to commence.
5. On March 17, 2017 an Order extending loss mitigation until June 13, 2017 was granted.

6. On April 20, 2017 Wells Fargo filed an Application for Early Termination of Loss Mitigation because “the loan was denied for all available loan modification options”.

7. The Debtor is appealing the decision due to change in economic circumstances.

8. The Debtor will be submitting a new package with proof of the increase in monthly income by May 9, 2017.

9. The lender will have adequate time to review the application prior to the June 13, 2017 deadline.

10. The Debtor is current on all Adequate Protection Payments owed to the bank.

Therefore, the Debtor requests the Court deny Wells Fargo’s Application for Early Termination of Loss Mitigation.

/s/ Christopher J. Balala

Christopher J. Balala, Esq.

Dated: April 24, 2017